



NF Formulas



PhytoPharmica



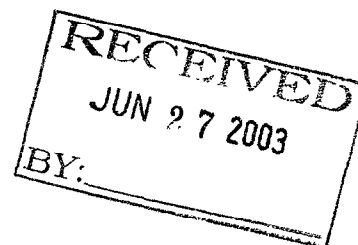
Tyler Encapsulations



Vitaline Formulas

June 30, 2003

Mr. Robert Moore
Office of Nutritional Products, Labeling &
Dietary Supplements, HFS 811
Food and Drug Administration
5100 Paint Branch Parkway
College Park, MD 20740



Notification of structure-function claims

Dear Sir:

This letter is to notify you that the following product manufactured, packed, and/or distributed by PhytoPharmica (9725 SW Commerce Circle, Suite A6, Wilsonville, OR 97070) has literature that contains a statement provided for by section 403(r)(6) of the Federal Food, Drug and Cosmetic Act. PhytoPharmica wishes to take advantage of the exemption to section 201(g)(1)(C) of the act and complies with section 403(r)(6) of the act.

Product Name	Statement	Ingredient(s) to which claim refers
Clinical Nutrients™ for Diabetics	" Clinical Nutrients for Diabetics is a nutritional supplement providing important vitamins, minerals, and botanicals to support glucose metabolism*. It includes vitamins C, E, and biotin, along with chromium, a key mineral*. The whole fruit of bitter melon, fenugreek seed, and standardized extracts of bilberry and <i>Gymnema sylvestre</i> are included for their proven efficacy*."	Vitamin C Vitamin E Vitamin B6 Folic Acid Vitamin B12 Biotin Magnesium Zinc Selenium Copper Manganese Chromium Sodium Gymnema (<i>Gymnema sylvestre</i>) Leaf Extract

97S 0162

LET

12232

85034

Product Name

Statement

Ingredient(s) to which claim refers (cont')

Bitter Melon (*Momordica charantia*) Fruit Extract

Fenugreek (*Trigonella foenum-graecum*)

Seed Extract

Bilberry (*Vaccinium myrtillus*) Berry Extract

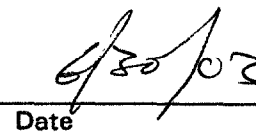
Mixed Bioflavonoids (from citrus fruits)

Vanadium

I certify that the information contained in this notice is complete and accurate, and that PhytoPharmica has substantiation that the statement is truthful and not misleading



Mario Roxas, N.D.
Director of Technical Services



Date